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February 22, 2018

VIA ECF

The Honorable Cathy L. Waldor, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, New Jersey 07101

Re: Prakash Rao, Ananth Rao and VKS Associates, LLC v.
Anderson Ludgate Consulting, LLC and Tricia Flanagan
Civil No.: 2:15-cv-03126-SRC-CLW
• *Request short adjournment of March 1, 2018 Settlement Conference*

Dear Judge Waldor:

This firm represents the plaintiffs in the above referenced matter. There is currently a settlement conference scheduled in this matter for March 1, 2018. With the consent of all counsel, I am writing on behalf of all parties to request that the settlement conference be postponed until March 22nd or a later date depending on Your Honor's schedule.

As Your Honor may recall, the parties have agreed to complete party depositions prior to conducting a settlement conference. Counsel for all parties believes completing the depositions before the settlement conference would be helpful. While the depositions of plaintiffs were just completed, as a result of scheduling conflicts the deposition of the individual defendant, Ms. Flanagan, has yet to occur. The next date Ms. Flanagan is available for her deposition is March 1st and we expect to complete same on that date.

In light of the above, the parties jointly request a short adjournment of the March 1st settlement conference until March 22nd, or a later date. The days of the week that work best for the plaintiffs are Mondays and Thursday.

Thank you for your consideration of the within request.

Respectfully yours,
CULLEN AND DYKMAN LLP

s/Daniel S. Eichhorn
DANIEL S. EICHHORN

cc: David Berlin, Esq. (via ECF and e-mail)

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